

# **EXHIBIT B**

Alabama Gas Corporation v. Travelers Casualty, et al.  
Kathleen Robison

2:10-CV-1840-IPS  
November 3, 2011

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

- - - - - x  
ALABAMA GAS CORPORATION, :  
Plaintiff, :  
v. : 2:10-CV-1840-IPS  
TRAVELERS CASUALTY AND SURETY :  
COMPANY, et al., :  
Defendants. :

- - - - - x

Deposition of KATHLEEN ROBISON  
Washington, D.C.  
Wednesday, November 3, 2011  
9:00 a.m.

Job No.: 80833  
Pages 1 through 122  
Reported by: Cassandra E. Ellis, RPR

1 the Munich Re Book said on that, yes.

2 Q And -- you -- you reviewed on the issue of  
3 whether a PRP letter is a suit, you reviewed the  
4 Munich Re Book?

5 MR. WINSTON: Objection, asked and  
6 answered. It's becoming argumentative.

7 A I reviewed what was in the Munich Re Book  
8 and looked at the notations and the symbols, yes.

9 Q And besides your review of the Munich Re  
10 Book, that you just testified to, and having counsel  
11 for Travelers discuss with you that issue, any other  
12 source that you have for your understanding as to  
13 whether or not that was a debatable issue?

14 MR. WINSTON: Object to the extent you  
15 mischaracterize her testimony. You can go ahead and  
16 answer.

17 A I did not do -- a -- a legal research on  
18 that, no, I did not do a legal research.

19 Q I'm just trying to be sure I understand --  
20 the -- the -- the source for your sentence, it says in  
21 your report, on page nine, this was a fairly debatable  
22 issue.

23 One source you said is your review of the  
24 Munich Re Book; is that right?

25 A That's correct.

1 Q And the second source is discussions with  
2 counsel for Travelers; is that right?

3 A That's correct.

4 Q Any others?

5 A That would be -- besides any of the  
6 testimony that the depositions I reviewed, that would  
7 be it.

8 Q So a third possibility would be -- the --  
9 the views of Travelers' claims department?

10 A Correct.

11 Q Okay. So the three things in there that  
12 you reviewed, the Munich Re Book, your discussion with  
13 counsel for Travelers, and the opinions of Travelers'  
14 claims department; is that right?

15 A Correct.

16 Q Is there anything else?

17 MR. WINSTON: Objection, asked and  
18 answered.

19 A Not that I recall.

20 Q We talked a minute ago about the activities  
21 that Travelers' claims department undertook with  
22 regard to the reconstruction of policies between  
23 December of 2008 and February of 2010, and I want to  
24 move away from the question of efforts to reconstruct  
25 the insurance policies and ask if you saw any evidence

1 that they were doing anything else between December  
2 2008 and February 2010, besides what was reflected in  
3 the Exhibit No. 5 that you already have in front of  
4 you?

5 A Yes.

6 Q What were those things?

7 A They -- they promptly -- they communicated  
8 with Alagasco.

9 Q So they -- they wrote letters, you mean?

10 A They -- they -- they wrote letters to  
11 Alagasco, they talked to Alagasco's attornies, they  
12 received information from Alagasco.

13 Q Anything else?

14 A As far as documents, that's -- that -- and  
15 I did see evidence of initiating -- assigning an  
16 investigator.

17 Q When was that?

18 A And that was after the February 3rd, 2008,  
19 2010 letter.

20 Q So that would not be between December 2008  
21 and February 2010?

22 A I believe you're -- that's correct, if  
23 we're looking at the February, I'm not quite sure, but  
24 it was after the 2003/2010 letter.

25 Q And to be clear, I think you meant February